

July 2011

# COAST GUARD

## Civil Rights Directorate Can Enhance Workforce Restructuring Efforts

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## Abbreviations

BAH	Booz Allen Hamilton
CRD	Civil Rights Directorate
CRSP	Civil Rights Service Provider
EO	Equal Opportunity
EEO	Equal Employment Opportunity
EEOC	Equal Employment Opportunity Commission
MD	Management Directive
USCG	United States Coast Guard

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July 18, 2011

Congressional Requesters

The United States Coast Guard's (USCG) Civil Rights Directorate's (CRD) principal functions are to provide Equal Opportunity (EO) services to its approximately 50,000 active duty military, and Equal Employment Opportunity (EEO) services to its 8,000 civilian employees. We reported in April 2010<sup>1</sup> that CRD had taken action to help resolve its management challenges, such as dissatisfaction among USCG personnel and to improve its civil rights program, primarily guided by recommendations resulting from a 2009 Booz Allen Hamilton (BAH) study that CRD commissioned.<sup>2</sup> Among these recommendations were that CRD centralize its organizational structure and institute a full-time equal employment workforce, which BAH expected would help significantly enhance program components, such as organizational cohesion. According to CRD officials, they implemented these recommendations in July 2009, and at the time of our last review continued to build on the organizational restructuring.

In response to BAH recommendations, in July 2009 CRD:

- Reorganized its field operations to deliver civil rights services by specialists through a centrally managed national structure divided into three national regions headed by regional managers. Regions are further divided into 14 subordinate zones. (see app. I for a geographical representation of CRD's workforce structure).
- Staffed the civil rights regions and zones with full-time field Civil Rights Service Providers (CRSPs) and discontinued the use of part-time (collateral duty) personnel.
- Established a centralized reporting structure for all CRSPs to report to three regional civil rights managers who in turn report directly to CRD headquarters, rather than the previous practice of reporting to a local command structure.

CRD relies on a blended workforce of full-time military and civilian CRSPs to provide USCG personnel with EO/EEO counseling, complaint

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<sup>1</sup> GAO, *Coast Guard: Civil Rights Directorate's Action Plans to Improve Its Operations Could be Strengthened by Implementing Several Aspects of Project Planning and Implementation Practices*, [GAO-10-571T](#) (Washington, D.C.: Apr. 27, 2010).

<sup>2</sup> Booz Allen Hamilton, *U.S. Coast Guard Office of Civil Rights Program Review*, (2009).

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investigation/processing, and EO/EEO training. CRD uses the same discrimination complaint processing procedures for military personnel as it does for civilians, except, unlike civilian employees, military personnel do not have standing at the Equal Employment Opportunity Commission (EEOC). However, military personnel may appeal their complaints to the Department of Homeland Security.

Because of the importance of the role that CRSPs have in implementing CRD's civil rights program, and your interest in how the current structure enables CRD to meet the needs of USCG personnel, you requested that we determine what CRD has done to help ensure that the reorganization of its workforce improves civil rights services. In particular, we examined workforce structure changes related to:

- The reorganization of field operations (e.g., use of full-time staff, rather than collateral-duty staff,<sup>3</sup> geographic distribution of USCG personnel, staff workload, and ratios of civil rights service providers to USCG personnel in different regions and zones where USCG personnel serve), and
- CRSP's qualifications (i.e., work experience, educational requirements, performance standards and qualifications, and training).

On May 18, 2011, we briefed your staff on CRD's efforts to ensure that the reorganization of its workforce has led to improvement and on challenges CRD continues to face. This report transmits materials used at the briefing and reprinted in Appendix I.<sup>4</sup>

This briefing is part of your larger request, for which a report will be issued later this year. That report will address (1) how CRD's performance goals and metrics compare with the standards in the Government Performance Results Act, and other related sources that provide guidance; and, (2) how CRD's program compares to the EEOC

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<sup>3</sup> According to USCG, collateral duty is assigned to an individual by the commanding officer, which is in addition to the individual's primary duty. These duties are normally performed at the individual's permanent duty station.

<sup>4</sup> The briefing slides in app. I contain some updates made subsequent to the May briefing to enhance technical accuracy.

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model program, as described in the EEOC's Management Directive (MD) 715.<sup>5</sup>

To evaluate CRD's efforts to help ensure that the reorganization of its workforce has improved civil rights services, we examined CRD documentation about organizational restructuring, field operations, and workforce qualifications. We analyzed CRD formal and informal civilian and military complaint data, staffing ratios of CRSPs to USGC personnel, and the CRD Alignment Billet Plan to identify factors that CRD considers in determining staffing ratios and staff allocations.<sup>6</sup> To determine CRD professional qualifications for CRSPs, we analyzed CRD's training development plan and training data. We interviewed CRD officials responsible for the design and implementation of workforce restructuring and field operations. We also conducted semistructured interviews with 7 of 40 CRSPs, who provide EO services to USCG military and EEO services to USCG civilian personnel.<sup>7</sup> We interviewed them to obtain their perspectives on their roles as CRSPs, CRD workforce restructuring, and professional qualifications. We selected CRSPs from across CRD's geographic zones who were assigned prior to the July 2009 reorganization so that they could offer perspectives on the former and the current organizational structures. We interviewed both civilian and military CRSPs, and we selected two civilian CRSPs who had been in the military. Because respondents were selected based on a nonprobability sample, the results cannot be generalized to all CRSPs.

We also interviewed EEOC officials and reviewed EEOC guidance and documentation related to field operations and workforce qualifications.<sup>8</sup>

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<sup>5</sup> The Equal Employment Opportunity Commission's Management Directive 715, or MD-715, provides policy guidance and standards for establishing and maintaining effective affirmative programs of equal employment opportunity under § 717 of Title VII of the Civil Rights Act of 1964, as amended, and effective affirmative action programs under section 501 of the Rehabilitation Act of 1973, as amended. See, 42 U.S.C. § 2000e-16 and 29 U.S.C. § 791.

<sup>6</sup> According to USCG, a billet is the authorization for a full-time military person. While the parallel civilian term is referred to as a position, CRD officials told us that they use the terms interchangeably to refer to a full-time staff person.

<sup>7</sup> As of April 2011, there were 45 CRSP positions, of which 5 were vacant.

<sup>8</sup> EEOC Management Directive (MD) 110 provides policy guidance that describes in detail the procedures that must be followed when processing complaints of discrimination filed by federal employees and applicants for federal employment alleging employment discrimination under 29 C.F.R. part 1614, as amended.

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For background information, we reviewed the 2009 BAH report and its recommendations related to restructuring CRD field operations and CRSP qualifications, and the 2009 BAH Workload Analysis of CRD field personnel. Lastly, we reviewed our prior testimony<sup>9</sup> for context regarding CRD's organizational restructuring action plan as well as a past GAO study on internal control.<sup>10</sup>

We assessed the reliability of staffing, training, and complaint data that CRD provided by verifying that the data fields for the data were consistent with our data requests, and determined that the data were sufficiently reliable for the purposes of this report. However, we determined that the data and systems that CRD uses for tracking, monitoring, and reporting CRSP training data were not reliable. We obtained and analyzed training records from CRD for each CRSP to determine if basic annual training requirements were being met.<sup>11</sup> Some of the records provided were missing data or incomplete. We are making a recommendation based on this observation.

We conducted this performance audit from November 2010 to July 2011 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Results In Brief

CRD has improved its civil rights services in certain respects, but additional potential enhancements remain:

- CRD continues to centralize its workforce, but lacks a disciplined and documented strategic approach for making staffing allocation decisions. In November 2009, BAH performed a workforce analysis of CRSPs' tasks, and determined that CRD needed 37 CRSPs in addition to the 41 staff already in place at that time. BAH also recommended that CRD devise a strategic growth plan to determine geographic staff allocations and to ensure that high-priority positions

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<sup>9</sup> [GAO-10-571T](#).

<sup>10</sup> GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999).

<sup>11</sup> EEOC Management Directive (MD) 110.



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are considered. CRD officials said they were in agreement with BAH's assessment, and were working to increase the CRSP workforce.

Nonetheless, CRD has not developed a disciplined and documented strategic approach that would promote transparency in decision making, and include criteria about geographic placements of CRSPs; nor has it identified the relative importance of priorities, including criteria for placing additional staff among its regions and zones. For example, in reviewing CRD's staffing allocation data plan for staffing 12 of the 37 positions that BAH recommended, the rationale was not clear for placing CRSPs in certain geographic locations rather than in others.

CRD officials told us they rely on several factors included in BAH's Workload Analysis in making geographic staffing allocation decisions, such as distance CRSPs travel to provide training or counseling; the number of civilian personnel in the zone; and the ratio of CRSPs to USCG personnel in a zone. CRD officials said they also rely on their management knowledge and judgment, noting that these are intangibles that a workforce analysis cannot fully capture. To a lesser extent, they stated they relied on complaint data to identify zones with higher levels of complaints, because overall, complaint levels have been relatively low across their regions for military and civilian personnel. These can be appropriate considerations when making staffing decisions. However, without a disciplined and documented strategic approach, transparency is not promoted and knowledge is not institutionalized. Further, without such an approach, CRD can not be assured that staffing allocation decisions are targeting the most pressing needs, and that civil rights issues of USCG are being addressed.

- CRD has taken steps to ensure that CRSPs are qualified to provide civil rights services, but has not been able to ensure that they meet basic training requirements, due to data and system reliability shortfalls. Regarding required training, to ensure quality counseling throughout the federal sector, EEOC MD-110 mandates an initial 32 hours of training and 8 hours of continuing training annually for all EEO service providers, which include CRSPs.<sup>12</sup>

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<sup>12</sup> See Chapter 2 of EEOC MD-110.

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To address the skill gaps in CRD's workforce noted in the November 2009 BAH report, CRD established a Training Development Plan that identifies training for CRSPs by level, and began developing a system to track mandatory and recommended CRSP training data. Other steps CRD took include establishing performance standards for CRSPs, organized annual regional and biennial annual headquarters conferences, and encouraging CRSPs to participate in professional training courses and EO/EEO conferences.

We identified data reliability gaps in CRD's current training tracking system that may prevent CRD from determining if CRSPs met minimum EEOC training requirements. Our analysis of the CRSP Master Training Record System, which consists of three spreadsheets containing regional CRSP training data, revealed inconsistencies in the recording of CRSP training data and incomplete records for 12 of 40 CRSPs, as of April 2011.<sup>13</sup> We also found that the Master Training Record System lacks internal controls such as a data verification process, and system documentation. Further, based on the interviews we conducted with 7 of 40 CRSPs, we determined there were inconsistent processes for managing and tracking training information. Federal internal control standards require that documents used to manage a program or operation are to be properly managed and maintained. Internal controls help to ensure that all transactions are completely and accurately recorded.<sup>14</sup>

CRD officials acknowledged that training data shortfalls exist because they had focused on other priorities, and limited resources prevented them from developing a centralized CRSP training system and processes in the past. CRD officials stated that in addition to the Master Training Record System, they can confirm that CRSPs have met training requirements by requesting certification directly from CRSPs.<sup>15</sup> However, relying on requests for certification from CRSPs is a less efficient and effective means of verifying training than through a centralized system.

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<sup>13</sup> The February 2009 BAH report found similar deficiencies with CRSP training records.

<sup>14</sup> [GAO/AIMD-00-21.3.1](#).

<sup>15</sup> In addition to training, CRD officials cited other ways, such as management and EEOC review of CRSP complaint reports, to ensure quality service.

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To address shortfalls in data reliability and their processes, CRD officials told us they are in the process of building a centralized Web-based system, to ensure accuracy and consistency of CRSPs training data. They anticipated this system being available in June 2011. However, CRD officials were not able to provide us with planning documentation that described the structure of this system, such as design specifications, or specific milestones for its development and implementation.

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## Conclusions

CRD has made progress toward improving its civil rights program. Further, CRD has made progress centralizing its workforce structure and in using criteria to make staff allocation decisions. A level of informed managerial discretion is important in making decisions related to human capital and staffing needs. However, as its workforce analysis plan recommended, it is important that CRD have a more formalized and documented approach, or use consistent criteria in decision making regarding staff allocations and prioritization of USCG needs. Without such a plan, transparency is not promoted and knowledge is not institutionalized. Further, without such an approach, CRD can not be assured that staffing allocation decisions are targeting the most pressing needs, and that civil rights issues of USCG are being addressed.

Similarly, CRD has taken steps to improve CRSP's qualifications and training, but without reliable data and systems to manage CRSP training data, CRD lacks an efficient and effective means of verifying that CRSPs meet basic EEOC training requirements, which plays a role in its annual MD-715 submission to EEOC. More importantly, if CRSPs are not meeting basic EEOC training requirements, it could impact the quality of civil rights services provided to USCG personnel. CRD officials informed us they are in the process of developing a centralized system to ensure accuracy and consistency of CRSP training data, but without documentation of system specifications and milestones for the development and implementation of this system, it is not clear that the new system will be able to achieve its intended purposes when launched.

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## Recommendations for Executive Action

We recommend that the Secretary of Homeland Security direct the Commandant of the Coast Guard to take the following two actions:

- To promote transparency in decision making, develop a disciplined and documented strategic approach that includes criteria for making geographic staffing allocation decisions, which would include helping

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identify the highest priorities for placing additional staff among its regions and zones.

- Implement a centralized system for CRSP training records that provides design specifications with associated implementation milestones and that aligns with internal control standards for data tracking, monitoring, and reporting.

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## Agency Comments and Our Evaluation

We provided a draft of this report to the Secretary of Homeland Security for review and comment. In written comments, which are reprinted in appendix II, DHS generally concurred with our findings, conclusions, and recommendations, and provided additional information about CRD's accomplishments and program activities in progress. However, DHS disagreed with certain information. Specifically, DHS concurred with our first recommendation related to developing a disciplined and documented strategic approach that includes criteria for making geographic staffing allocation decisions. However, DHS disagreed with our characterization of the basis for CRD's strategic decision making, listing several documents it provided to us showing the analyses CRD undertook to aid decision making about staffing allocations, and determining priorities for placing staff. We acknowledge that CRD provided various documents for review during the course of our work. However, CRD did not provide sufficient detail about how it used this information in determining staffing allocations. For example, CRD's billet placement plan identifies particular zones as, for example, 'High Priority,' or 'Not as High'; however, it lacks any indication of how the number of complaints, distances CRSPs travel, or other factors were considered in establishing the different staffing priority levels. Further, CRD officials provided complaint data that covered two fiscal years, but there was no indication or analysis as to if or how this data was used to determine staffing or make workload projections. Additionally, in response to our request for evidence regarding staffing allocations during the time of our work, we did not receive the memos, the digest, or the May 2011 internal document that CRD cited as a summarization of the factors considered in making staffing-allocation decisions. To the extent that these documents help CRD establish a disciplined and systematic decision-making process, we encourage the agency's use of this information in support of its efforts to address our recommendation. As we stated in our report, without such a process, transparency is not promoted and knowledge is not institutionalized. Therefore, we believe our recommendation remains valid until there is further evidence of a disciplined and systematic decision-making process for allocating staff.

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DHS also agreed with our second recommendation to implement a centralized system for CRSP training records that provides design specifications with associated implementation milestones, and that aligns with internal control standards for data tracking, monitoring and reporting. However, DHS disagreed with our application of EEOC's MD-110, which identifies minimum training standard for all CRSPs, stating that the standard only applies to the subset of CRSPs who perform EEO counseling.<sup>16</sup> However, CRSP data that CRD provided from its CRSP Master Training Record System for our analysis showed no indication of a difference in training requirements between CRSPs who are EEO counselors, and CRSPs who are not. As stated in the report, based on our review of CRSP training records, the data provided to us did not verify that the MD-110 requirement was met for all CRSPs. DHS also disagreed with our assessment that reliability gaps in CRD's current training tracking matrix may prevent the Directorate from validating minimum training requirements, stating that it has other means for determining if training requirements were met, such as contacting CRSPs directly to verify compliance with training requirements. However, as stated in our report, this approach is a less efficient and effective means of verifying training requirements than through a centralized system. CRD described the plans underway to develop and implement a Web-based application—the Training Management Tool—that would enable CRD regional managers to validate training completion on a real-time basis. To the extent that this Web-based application provides the capacity to accurately track, monitor and report CRSP training information, we believe use of such a tool could be responsive to our recommendation. DHS also provided technical comments, which we incorporated as appropriate.

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We will send copies of this report to the Secretary of Homeland Security and other interested parties. The report also will be available at no charge on GAO's Web site at <http://www.gao.gov>.

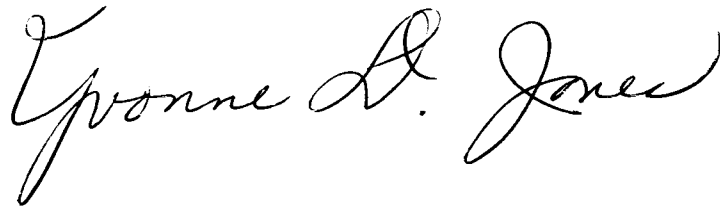
If you or your staff have any questions concerning this report, please contact Yvonne D. Jones at (202) 512-6806 or [jonesy@gao.gov](mailto:jonesy@gao.gov). Contact points for our Office of Congressional Relations and Public Affairs may be

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<sup>16</sup> EEOC Management Directive (MD) 110 provides policy guidance that describes in detail the procedures that must be followed when processing complaints of discrimination filed by federal employees and applicants for federal employment alleging employment discrimination under 29 C.F.R. part 1614, as amended.

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found on the last page of this report. GAO staff who made major contributions to this report are listed in Appendix III.

A handwritten signature in black ink, reading "Yvonne D. Jones". The signature is written in a cursive, flowing style with a large initial 'Y' and a distinct 'D'.

Yvonne D. Jones  
Director, Strategic Issues

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*List of Requesters*

The Honorable John L. Mica  
Chairman

The Honorable Nick J. Rahall, II  
Ranking Member  
Committee on Transportation and Infrastructure  
House of Representatives

The Honorable Bennie Thompson  
Ranking Member  
Committee on Homeland Security  
House of Representatives

The Honorable Frank A. LoBiondo  
Chairman

The Honorable Rick Larsen  
Ranking Member  
Subcommittee on Coast Guard and Maritime Transportation  
Committee on Transportation and Infrastructure  
House of Representatives

The Honorable Elijah Cummings  
House of Representatives

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# Appendix I: Briefing Slides Presented to Congressional Requesters

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## **GAO Briefing to Congressional Requesters**

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### **Coast Guard: Civil Rights Directorate Can Enhance Workforce Restructuring Efforts**

**May 18, 2011**

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## Background

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The United States Coast Guard's (USCG) Civil Rights Directorate (CRD) principal functions are to provide Equal Opportunity (EO) services to its approximately 50,000 active duty military and Equal Employment Opportunity (EEO) services to its approximately 8,000 civilian personnel.

CRD's military and civilian Civil Rights Service Providers (CRSPs) provide these services in the form of EO/EEO counseling, complaint investigation/processing, and EO/EEO training.

In late 2008, CRD commissioned an external review and evaluation of CRD's plans to improve its provision of civil rights services. In February 2009, Booz Allen Hamilton (BAH) completed its review, and made several recommendations related to CRD workforce organization, including a centralized reporting structure, use of full-time CRSPs, and workforce training.

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## Background (Cont.)

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To address the BAH recommendations, in July 2009, CRD:

- reorganized its field operations into three regions that are further subdivided into 14 zones, based on existing staff allocations (see app. I for the geographical reorganization of CRD's workforce structure);
- staffed national regions and zones with full-time field CRSPs and discontinued the use of collateral duty staff; and
- established a centralized reporting structure for all CRSPs to report directly to CRD, rather than the previous practice of reporting to a local command structure.

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## Objective

Identify what the USCG's CRD has done to help ensure that the reorganization of its workforce improves the provision of civil rights services. More specifically, evaluate workforce structure changes related to the following:

- Issue 1: The reorganization of field operations (e.g., use of full-time staff rather than collateral duty staff,<sup>1</sup> geographic distribution of USCG personnel, staff workload, and ratios of civil rights service providers to USCG personnel in different regions and zones where USCG personnel serve), and
- Issue 2: CRSP's qualifications (i.e., work experience, educational requirements, performance standards and qualifications, and training).

<sup>1</sup>According to USCG, collateral duty is assigned to an individual by the commanding officer and is in addition to the individual's primary duty. These duties are normally performed at the individual's permanent duty station.

## Scope and Methodology

To address this objective, we

- **Examined:**
  - Documentation from CRD about organizational restructuring, which CRD began implementing in 2009, field operations, and workforce qualifications from July 2009 to March 2011.
  - Two 2009 Booz Allen Hamilton (BAH) Reports:<sup>2</sup>
    - one that addressed recommendations on restructuring of the CRD field operations, which CRD commissioned and used to develop action plans to improve its civil rights operations, and
    - the other, a workload analysis of CRD field personnel, which according to CRD officials, is being used to develop a rationale for staffing decisions.
  - Guidance from the Equal Employment Opportunity Commission (EEOC) related to workforce qualifications.
- **Analyzed:**
  - Complaint data (fiscal year 2010), staffing ratio data (as of April 2011), and CRD's geographical realignment plan (October 2010); and
  - Training development plan (as of December 2009) and training data (calendar year 2010)
- **Interviewed:**
  - CRD officials and CRSPs about organizational restructuring, field operations, and workforce qualifications; and
  - EEOC officials about workforce qualifications and best practices for EEO field operations and organizational structures.

<sup>2</sup> We did not conduct an independent assessment of BAH's work.

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## Scope and Methodology (Cont.)

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We assessed CRD data and found them sufficiently reliable for the purposes of this report, except for data and systems that CRD uses for tracking, monitoring, and reporting CRSP training data. We are making a recommendation based on this observation.

We conducted this performance audit from November 2010 through May 2011, in accordance with generally accepted government auditing standards.

Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective.

We believe that the evidence obtained provide a reasonable basis for our findings and conclusions based on our audit objective.

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## Results in Brief

CRD continues to build on its workforce reorganization, but lacks a disciplined and documented strategic approach that would promote transparency in decision making, and include criteria about geographic placements of CRSPs; nor has CRD identified the highest priorities for placing additional staff among its regions and zones.

- CRD agreed with the results of BAH's 2009 *Workload Analysis*, which included a recommendation that CRD develop a strategic growth plan to aid decision making for field staff allocation.
- However, CRD's current staffing plan for allocating CRSPs to specific geographic areas lacks a disciplined strategic approach to developing a strategic growth plan that would include, for example, documented rationale and criteria for staff allocation.

CRD has taken steps to improve CRSP qualifications, but lacks reliable data and systems to assure compliance with minimum training requirements.

- CRD made improvements in CRSP qualifications by, among other things, setting performance standards, establishing a training development plan, and organizing regional and headquarters conferences.
- CRD lacks reliable CRSP training data and systems to assure compliance with minimum EEOC training requirements.

## Issue 1: CRD Continues to Build on its Workforce Reorganization

CRD retained BAH to perform a workload analysis for workforce planning purposes. By considering CRSP tasks, BAH determined that:

- In addition to the 41 staff in place at the time, CRD needed an additional 37 field CRSPs for tasks, such as complaint processing and training, if CRD is to improve services.<sup>3</sup>
- CRD should devise a strategic growth plan to determine geographic staff allocations to help ensure that high priority factors, such as complaints processing and assessment and training needs, are used in decision making about staff allocations.
- CRD's strategic plan should include factors that capture the variations across zones such as the number of complaints per zone, number of personnel supported, average distance between commands, mix of civilian and military personnel supported, geographic size of each zone, and the existence of adequate supervisory leadership.

CRD agreed with BAH's workload analysis, and developed an allocation plan for distributing the 37 additional positions geographically as they become authorized, 4 of which were authorized in 2010, and 12 which have been authorized for 2011.

<sup>3</sup> BAH did not include the key tasks and required level of staffing at the headquarters level in its analysis.



## Issue 1: CRD Lacks a Documented Strategic Approach to Support Staffing Allocation Decisions

However, based on our review of documents and data CRD provided as well as discussions with CRD officials, we found no evidence that CRD took a disciplined and documented approach in considering the relative importance of factors that BAH cited as high priorities in CRD's staff allocation decisions (see app. III for CRD's current and proposed staff allocation).<sup>4</sup> For example,

- CRD did not provide us with a documented rationale or criteria for its decision to staff the 12 new positions in certain geographic locations over others. In April 2010, we recommended that CRD ensure that internal controls were in place to maintain documentation necessary to facilitate oversight.<sup>5</sup> CRD agreed with our recommendation and said that it would imbed internal control functions into staff responsibilities to maintain the documentation to oversee and correct plans as they are designed and implemented.
- CRD did not have a documented methodical approach to determine how a variety of factors that BAH cited as priorities, such as complaint levels or civilian and military personnel levels, which vary from zone to zone, impact the decision to allocate the 12 new positions to particular regions or zones (see app. IV for supporting detail on variations across zones such as USCG personnel and complaint levels).

<sup>4</sup>CRD provided us documents, for example, on CRD's geographic realignment as well as staffing, field operations, and complaint data.

<sup>5</sup>GAO, *Coast Guard-Civil Rights Directorate's Action Plans to Improve Its Operations Could be Strengthened by Implementing Several Aspects of Project Planning and Implementation Practices*, GAO-10-571T (Washington, D.C.: Apr. 27, 2010).

## Issue 1: CRD Lacks a Documented Strategic Approach to Support Staffing Allocation Decisions (Cont.)

According to CRD officials, they relied on the following factors to make staff allocation decisions:

- the distance CRSPs have to travel to provide training or counseling,
- the ratio of CRSPs to personnel, and
- maintaining the mix of military and civilian CRSPs to support USCG's blended military and civilian workforce.

CRD officials also relied on their professional judgment and knowledge of the specific geographical locales. To ensure continuity, CRD gives additional consideration to placements of civilian CRSP positions in zones where only military CRSPs are serving.<sup>6</sup>

To a lesser extent, CRD officials stated that they relied on complaint data per zone, because overall, complaint levels have been relatively low across the regions for military and civilian personnel.

<sup>6</sup> According to CRD officials, military CRSPs serve a 4-year rotational assignment, with a possible 2-year extension, while civilian CRSPs have no such rotational requirement.

## Issue 1: CRD Lacks a Documented Strategic Approach to Support Staffing Allocation Decisions (Cont.)

Management's judgment is one of many important factors in making human capital and equal opportunity program decisions, but federal governmentwide internal control standards require that major management decisions be documented and readily available for examination.<sup>7</sup>

As BAH's workload analysis plan recommended, and based on our previous work, it is important that CRD has a disciplined, well-documented strategic approach for decision making regarding staff allocations and prioritization of needs.<sup>8</sup> This type of planning is very important in:

- determining the critical skills and competencies that will be needed to achieve current and future programmatic results; and
- developing strategies that are tailored to address gaps in number, deployment, and alignment of human capital approaches for all critical skills and competencies that need attention.

This approach to workforce planning may also help CRD use factors such as the number of formal and informal complaints per zone or the existence of adequate supervisory leadership.

Without such a disciplined and documented strategic approach, knowledge is not institutionalized, and CRD cannot be assured that staffing allocation decisions are resulting in targeting the most pressing needs, and that civil rights issues of USCG are being addressed.

<sup>7</sup> GAO, *Standards for Internal Control in the Federal Government*, GAO/AIMD-00-21.3.1 (Washington, D.C.: November 1999).

<sup>8</sup> GAO, *Human Capital: Key Principles for Effective Strategic Workforce Planning*, GAO-04-39 (Washington, D.C.: December 2003) and GAO, *A Model of Strategic Human Capital Management*, GAO-02-373SP (Washington, D.C.: March 2002).

## Issue 2: CRD Has Taken Steps to Improve CRSP Qualifications

In the February 2009 BAH study commissioned by CRD, BAH made several recommendations for CRD to manage all aspects of CRSP training activities and to ensure that CRSPs have required skills and training.

As part of the justification for CRD restructuring, the CRD Director outlined the need for:

- skilled and experienced full-time civil rights professionals; and
- a training inventory to ensure CRSP credentials are kept current.

Additionally, to ensure quality counseling throughout the federal sector, EEOC Management Directive (MD) 110 requires an initial 32 hours of training and 8 hours of continuing training annually for all EEO service providers, which include CRSPs.<sup>9</sup>

<sup>9</sup> MD-110 provides policy guidance that describes in detail the procedures that must be followed when processing complaints of discrimination filed by federal employees and applicants for federal employment alleging employment discrimination under 29 C.F.R. part 1614, as amended.

## Issue 2: CRD Has Taken Steps to Improve CRSP Qualifications (Cont.)

Based on our review of CRD documentation and discussions with CRD officials, CRD took the following steps to improve CRSP professional qualifications and training:

- established performance standards for CRSPs;
- established a Training Development Plan identifying a suite of EO/EEO training courses for different levels of CRSPs;
- organized annual regional and biennial headquarters conferences;
- encouraged CRSP's to participate in professional training courses and EO/EEO industry conferences; and
- initiated the development of a system, CRSP Master Training Record System, to track CRSP training data.

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## Issue 2: CRD Lacks Reliable Data and Systems to Assure Compliance with Minimum Training Requirements

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CRD officials told us that all CRSPs met the annual EEOC training requirements.

However, based on our analysis of data from the CRSP Master Training Record System, 12 of the 40 CRSPs, as of April 2011, had incomplete records for the required 8 hour EEO Counselor annual refresher training in 2010.<sup>10</sup>

Based on the data CRD provided, we also identified significant gaps in the CRSP training data:

- incomplete CRSP data in one regional report,
- inconsistent recording of CRSP data across three separate regional reports,
- inaccurate summaries of regional data, and
- undated documentation.

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<sup>10</sup> The February 2009 BAH report found similar deficiencies with CRSP training records.

## Issue 2: CRD Lacks Reliable Data And Systems to Assure Compliance with Minimum Training Requirements (Cont.)

Information systems should include internal controls and reliability procedures.

The federal government's internal control standards state that:

- documents used to manage a program or operation are to be properly managed and maintained.
- Transactions should be promptly recorded to maintain their relevance and value to management in controlling operations and making decisions. Internal controls help to ensure that all transactions are completely and accurately recorded.
- A variety of controls can be used in information processing to help ensure the validation and verification of data maintained in centralized systems. For example, edit checks can be conducted on data entered for information processing.<sup>11</sup>

Based on past GAO work, data verification and validation are necessary to ensure that users can have confidence in the reported performance information.<sup>12</sup>

<sup>11</sup> GAO/AIMD-00-21.3.1

<sup>12</sup> GAO, *Performance Plans – Selected Approaches for Verification and Validation of Agency Performance Information*, GAO/GGD-99-139 (Washington, D.C.: July 1999).

## Issue 2: CRD Lacks Reliable Data and Systems to Assure Compliance with Minimum Training Requirements (Cont.)

The CRSP Master Training Record System lacks internal controls such as:

- data verification - an assessment of data completeness, accuracy, and consistency; and,
- system documentation – system flowcharts, design specifications, user manuals, and documentation of the process for submitting, maintaining, and reporting CRSP training data.

Previously, monitoring and tracking of CRSP training rested with CRD regional managers who certified to CRD Headquarters that CRSPs had completed their EEOC training requirements.

Until January 2011, CRD had no automated and centralized system for tracking, monitoring, and reporting CRSP training data. CRSP training data are currently located in an interim tool (three separate spreadsheets containing regional CRSP training data).

Based on the interviews we conducted with 7 of 40 CRSPs, we determined there were inconsistent processes for tracking and managing training information.<sup>13</sup> This includes inconsistent notifications for required training and different regional approaches to tracking training requirements.<sup>14</sup>

<sup>13</sup> As of April 2011, there were 45 CRSP positions, of which 5 were vacant.

<sup>14</sup> Because respondents were selected based on a nonprobability sample, the results cannot be generalized to all CRSPs.





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## Issue 2: CRD Lacks Reliable Data and Systems to Assure Compliance with Minimum Training Requirements (Cont.)

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According to CRD officials, because of other priorities and limited resources, CRD did not begin developing a centralized process and system for tracking and monitoring training records until January 2011.

To address the shortfalls in their Master Training Record System, such as those we identified, CRD officials said they are developing a Web-based system designed to centralize CRSP training data, and that this system would be available in June 2011.

At the time of our review, CRD did not have a planning document that described the structure of this system, including system flowcharts, design specifications, or a user manual. However, according to CRD officials, once the new Web-based system is fully implemented, CRD should be able to ensure the accuracy of CRSP training data.

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## Issue 2: CRD Lacks Reliable Data and Systems to Assure Compliance with Minimum Training Requirements (Cont.)

Based on CRD's belief that training provides CRSPs with knowledge, skills, and abilities to perform civil rights functions, the quality of civil rights services provided to USCG personnel may be diminished if CRSPs are not meeting basic EEOC training requirements.<sup>15</sup>

However, without reliable training data and systems, CRD cannot be fully assured that all of its CRSPs have completed mandatory EEO Counselor training requirements. This type of information plays a role in certifying to EEOC through the annual MD-715 submission that CRSPs have met basic EEOC training requirements.<sup>16</sup>

CRD officials stated that in addition to the Master Training Record System, CRD could confirm that CRSPs have met training requirements by requesting certification directly from CRSPs. However, relying on requests for certification from CRSPs is a less efficient and effective means of verifying training than through a centralized system.

<sup>15</sup> In addition to training, CRD officials cited other ways, such as management and EEOC review of CRSP complaint reports, to ensure quality service.

<sup>16</sup> MD-715 provides policy guidance and standards for establishing and maintaining effective affirmative programs of equal employment opportunity under § 717 of Title VII of the Civil Rights Act of 1964, as amended, and effective affirmative action programs under section 501 of the Rehabilitation Act of 1973, as amended. See, 42 U.S.C. § 2000e-16 and 29 U.S.C. § 791.

## Conclusions

- Issue 1: CRD has made progress in using criteria to make staff allocation decisions, but without a formalized staffing approach, CRD can not be assured that staffing allocation decisions are targeting the most pressing needs and that civil rights issues of USCG are being addressed.
- Issue 2: CRD has taken steps to improve CRSPs' qualifications and training, but without reliable data and systems to manage CRSP training data, CRD lacks an efficient and effective means of verifying that CRSPs meet basic EEOC training requirements. If CRSPs are not meeting basic EEOC training requirements, it could impact the quality of civil rights services provided to USCG personnel. CRD officials informed us they are in the process of developing a centralized system to ensure accuracy and consistency of CRSP training data, but without documentation of system specifications and milestones for the development and implementation of this system, it is not clear that the new system will be able to achieve its intended purposes when launched.

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## Recommendations for Executive Action

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GAO recommends that the Secretary of Homeland Security direct the Commandant of the Coast Guard to take the following two actions:

- to promote transparency in decision making, develop a disciplined and documented strategic approach that includes criteria for making geographic staffing allocations decisions, which would help identify the highest priorities for placing additional staff among its regions and zones; and
- implement a centralized system for CRSP training records that provides design specifications with associated implementation milestones and that aligns with internal control standards for data tracking, monitoring, and reporting.

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# Appendix I

Figure 1: Geographical Reorganization of CRD Services, as of March 2011



Source: GAO analysis of CRD data.

## Appendix II: CRD's Current and Proposed Allocation of Additional CRSP Staff

Table 1: USCG Personnel and Civil Rights Service Providers by Region and Zone, as of April 2011

CRD region/ zone	Total USCG personnel per geographic zone	CRSPs		
		Current CRSPs	CRD's allocation of remaining proposed billets	Allocation of 12 authorized billets (FY 2011) <sup>1</sup>
<b>CRDHQ</b>				3
<b>Region 1</b>				
Reg HQ <sup>2</sup>	-	3	2	1
zone 1	3,491	3		
zone 2	5,445	3	1	1
zone 3	2,181	2	2	1
zone 4	3,930	2	2	
<b>Region 2</b>				
Reg HQ	-	3	4	3 <sup>3</sup>
zone 5	4,888	4	4	
zone 6	3,965	2	3	
zone 7	5,764	4	2	
zone 8	3,306	3	2	
zone 9	2,311	1	3	1
zone 10	2,765	3	2	
<b>Region 3</b>				
Reg HQ	-	3		
zone 11	5,904	2	3	1
zone 12	2,509	3	1	1
zone 13	3,485	2	2	
zone 14	1,211	2		
<b>Total</b>	<b>51,155</b>	<b>45</b>	<b>33</b>	<b>12</b>

<sup>1</sup> CRD received authorization for 12 billets in fiscal year 2011 (this is in addition to 4 billets CRD received in fiscal year 2010). CRD officials told us that they use the terms billet and position interchangeably to refer to a full-time staff person.

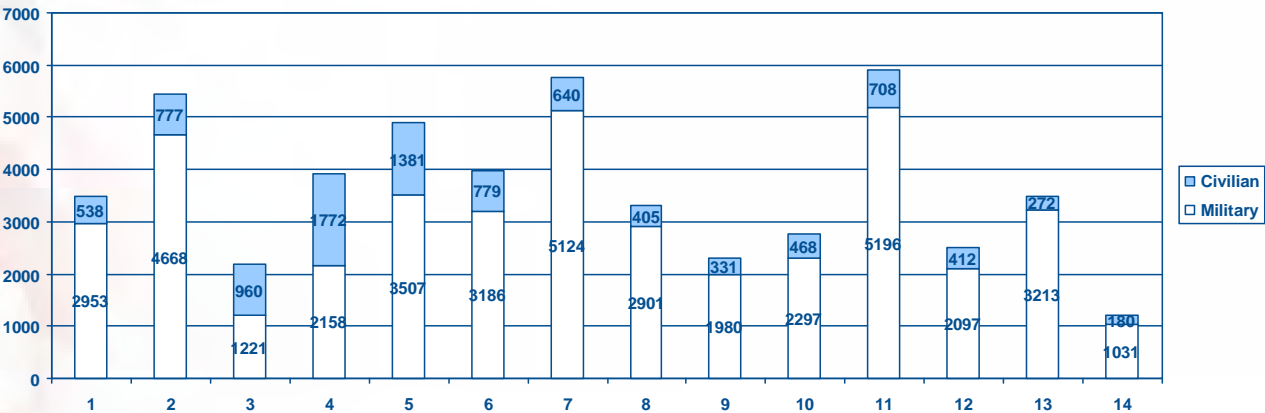
<sup>2</sup> According to CRD officials, regional CRSPs provide civil rights services for USCG personnel in zones within their region on an as-needed basis.

<sup>3</sup> CRD officials told GAO that they are in process of splitting Region 2 into two regions, and they are going to staff the Region 4 HQ with two billets.

## Appendix III: Variations Across Zones That Could Influence Allocating Additional CRSP Staff

Figures 1-3 illustrate variations across zones in the number of military and civilian USCG personnel supported, and the number of formal and informal complaints. Other variables not depicted include travel necessary to provide training and counseling.

Figure 1: USCG Military and Civilian (Including Nonappropriated Fund Employees) Personnel by Zone (as of April 2011)



Source: GAO analysis of CRD data.

## Appendix III: Variations Across Zones That Could Influence Allocating Additional CRSP Staff (Cont.)

Figure 2: Fiscal Year 2010 Formal Complaints by Zone

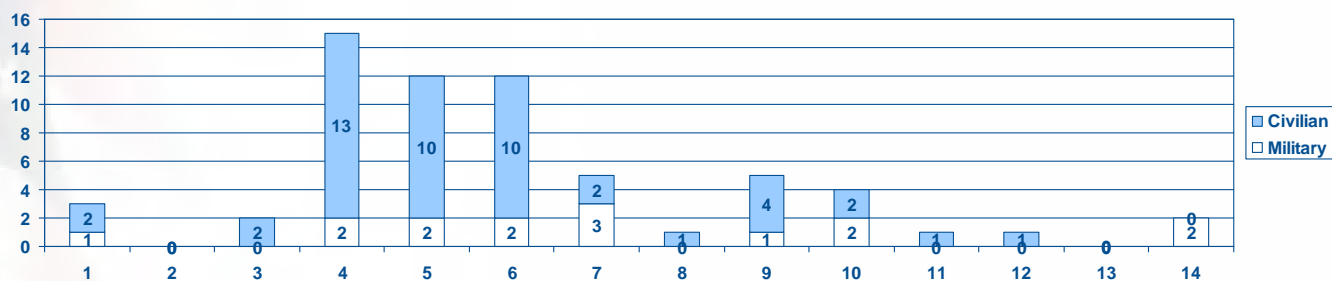
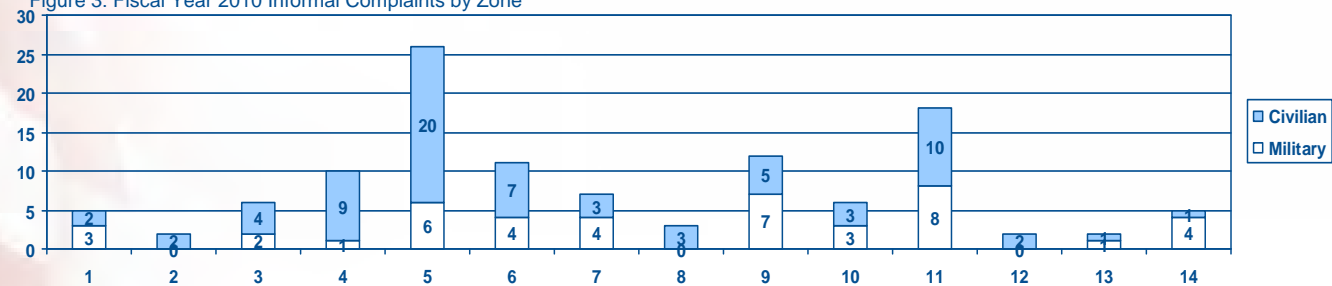


Figure 3: Fiscal Year 2010 Informal Complaints by Zone



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Source: GAO analysis of CRD data.



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## **Contact**

Chuck Young, Managing Director, Public Affairs, [youngc1@gao.gov](mailto:youngc1@gao.gov)  
(202) 512-4800, U.S. Government Accountability Office  
441 G Street NW, Room 7149, Washington, D.C. 20548

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# Appendix II: Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

July 1, 2011

Yvonne Jones  
Director, Strategic Issues  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Re: Draft Report GAO-11-718, "COAST GUARD: Civil Rights Directorate Can Enhance Workforce Restructuring Efforts"

Dear Ms. Jones:

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the U.S. Government Accountability Office's (GAO's) work in planning and conducting its review and issuing this report.

The Department is pleased to note the report's positive acknowledgement that the United States Coast Guard's (USCG's) Civil Rights Directorate (CRD) has made progress toward improving its civil rights program. The USCG also notes the operational successes listed below, which highlight the positive effect of workforce restructuring on Coast Guard civil rights service delivery.

- A reduction by 27 percent in the number of days required to investigate civilian complaints compared with the former structure.
- A reduction by 40 percent in the number of days required to investigate military complaints of discrimination compared with the former structure.
- A complete elimination in 2009 of the substantial workload of military complaints for which no decision had been rendered (affecting complaints which had arisen years earlier).
- Equal Employment Opportunity Commission (EEOC), officials have noted the Coast Guard's favorable compliance level with Management Directive (MD)-715, especially progress under what they classify as leadership (i.e., the Director reporting to the agency head, and involvement including appropriate resourcing support by leadership).

These successes comport directly with the six elements of a model civil rights program as defined in EEOC MD-715.

Although the USCG generally concurs with GAO's findings and conclusions, it disagrees with (1) GAO's characterization of the basis for CRD strategic decisions, (2) application of MD-110, and (3) assessment that reliability gaps in the CRD's current training tracking matrix may prevent the Directorate from validating minimum training requirements.

The draft report contained two recommendations directed to DHS. As discussed below, DHS concurs with both recommendations. Specifically, GAO recommended the Secretary of Homeland Security direct the Commandant of the Coast Guard take the following actions:

**Recommendation 1:** To promote transparency in decision making, develop a disciplined and documented strategic approach that includes criteria for making geographic staffing allocation decisions that would include helping identify the highest priorities for placing additional staff among its regions and zones.

**Response:** DHS concurs. The USCG agrees that using a disciplined and documented strategic approach to making staffing allocation decisions is important and that CRD has done this. Specifically, CRD provided the GAO audit team numerous documents showing the analyses it undertook and the high-priority factors it established in billet placement. Examples include:

- *Staffing Ratios:* A table depicting the current and future ratio of Civil Rights Service Providers to U.S. Coast Guard workforce across 3 regions and 14 zones.
- *Geography:* A document depicting the geographic location of Coast Guard's workforce, and coverage areas by region and zone (i.e., cross-populated with the location of existing CRD staff). This document also depicted another important factor that CRD took into consideration specifically the distance Career Retention Screening Panels must travel in order to service personnel within their areas of responsibility.
- *Workload Projection:* A longitudinal analyses of informal and formal complaint activity over successive years and by geography.
- *Billet Placement Plan:* An analysis dated October 30, 2010, entitled, *Geographical Alignment Billet Plan based on Workload Analysis: Indication of 37 Billets*, which depicts the overall schema for placement of billets identified in the workload analysis. The plan also depicts the priority designation for 12 billets already sourced.

In addition, many other CRD workforce reorganization-related documents exist that illustrate USCG efforts to promote transparency, of which GAO may not be fully aware. Examples include:

- Memo dated November 2010: Request Approval To Make Organizational Adjustments
- Memo dated December 14, 2010: Amendment To Organizational Adjustments Request
- Digest dated March 21, 2011: Civil Rights Program Position Establishment

- Memo dated March 31, 2011: Organization Modification Request

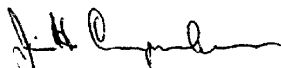
In May 2011, CRD also created another internal document that further summarizes its consideration of the foregoing factors, adds to the related documentation already on file, and supplements USCG efforts to promote transparency of its decision-making processes.

**Recommendation 2:** Implement a centralized system for CRSP training records that provides design specifications with associated implementation milestones and that aligns with internal control standards for data tracking, monitoring, and reporting.

**Response:** DHS concurs. The USCG currently tracks Equal Employment Opportunity (EEO) Counselor Training using an Excel spreadsheet. The small number of personnel affected and infrequent training cycle time facilitate ease of data collection via this method. In addition to the Excel spreadsheet, upon approval and action by FORCECOM, the CRD plans to utilize the Training Management Tool, the Coast Guard's enterprise-wide training, qualification, and certification data reporting system. When inclusion of EEO counselors is approved and implemented, this Web-based application should enable CRD Regional Managers to validate training completion within their staffs on a real-time basis, thus far exceeding the requirement of annual assurance. Of note, the CRD recently updated its EEO Counselor Training Spreadsheet and can confirm that all EEO Counselors completed the required 8-hour EEO Counselor annual refresher training.

Again, thank you for the opportunity to review and comment on this draft report. Technical comments have been submitted under separate cover. We look forward to working with you on future Homeland Security engagements.

Sincerely,



Jim H. Crumpacker  
Director  
Departmental GAO/OIG Liaison Office

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# Appendix III: Contact and Staff Acknowledgments

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## GAO Contact

Yvonne D. Jones, (202) 512-6806 or [jonesy@gao.gov](mailto:jonesy@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, individuals making key contributions to this report included Neil A. Pinney, Assistant Director; Cheri Y. Truett, Analyst-In-Charge, Irina Carnevale; Robert Gebhart; Angela Leventis; Lois Hanshaw; and Terry Richardson.

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